

EXHIBIT 1

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7 *Co-Lead/Liaison Counsel for Plaintiffs*

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF ARIZONA

10
11 In Re Bard IVC Filters Products Liability
12 Litigation

No. MD-15-02641-PHX-DGC

**DECLARATION OF ROBERT
VOGELZANG, M.D.**

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15 I, Robert Vogelzang, M.D. declare as follows:

16 1. I am a testifying expert for the Plaintiffs in this case.

17 2. I am a duly qualified physician practicing in the state of Illinois, United
18 States. I am Board-certified in diagnostic radiology and subspecialty certified with a
certificate of added qualification in vascular and interventional radiology, both granted by
19 the American Board of Radiology. 3. My subspecialty is in vascular and interventional
20 radiology. I am an attending interventional radiologist at Northwestern Memorial Hospital
in Chicago and I hold an academic appointment in the Northwestern University Feinberg
21 School of Medicine as a Professor of Radiology. I have published over 180 articles in
peer-reviewed journals principally on the subject of Interventional Radiology. I and my
22 colleagues have removed well over 1000 IVCs using a variety of techniques many of
them developed by me and my colleagues. This includes removal of over 200 Bard
23 inferior vena cava filters of varying types and models of the Bard retrievable line
including Recovery, Eclipse, Meridian, G2 and Denali.

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25 3. I have written three reports in this case dated March 2, 2017, April 9, 2017,
26 and April 19, 2017. My reports concern medical monitoring and general causation. As to
the three reports I have written in this case, and all the opinions I have developed in this
27 case; they are based on my own clinical and academic experience including my review of
peer-reviewed medical literature
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1 4. Dr. Resnick has not provided to me any information related to the consulting he
2 did for Bard or any mental impressions of Bard attorneys; therefore no information
3 given to Dr. Resnick from Bard had any influence on my opinions and my reports
4 developed in this case.

5 In accordance with 28 U.S. Code § 1746, I declare under penalty of perjury under the laws
6 of the United States that the foregoing is true and correct and that this declaration was
7 executed on July 26 2017.

8 Executed this 26th day of July, 2017 in NY.

9 Signature: R Vogelzang

10 Printed name: ROBERT VOGELZANG, M.D.

11 Address: 251 E Huron Chicago IL

12 Phone Number: 312 926 5112

13 Notary:

14 City/County of New York

15 The foregoing declaration was acknowledged before me this 26 day of July 2017.

16 Linda Ricci
17 Notary Public

18 My Commission expires, _____.

19 LINDA RICCI
20 Notary Public, State of New York
21 No. 01R0042190
22 Qualified in New York County
23 Commission Expires May 15, 2018
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